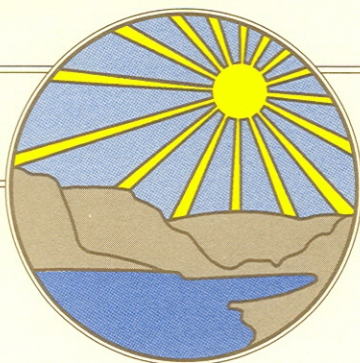


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CITY OF GOLDENDALE

P.O. BOX 69

1103 SOUTH COLUMBUS

GOLDENDALE, WASHINGTON 98620

December 14, 2004

Department of Ecology
Water Quality Program

DEC 21 2004

Mr. Ken Koch
Water Quality Program
Washington State Department of Ecology
P.O. Box 47600
Olympia, Washington 98504

Re: Comments on Proposed 2002/2004 Water Quality Assessment

Mr. Koch:

This letter provides the City of Goldendale's comments regarding Washington State Department of Ecology's candidate listings in the draft 2002/2004 Water Quality Assessment. Our comments are limited to Category 4c (impaired) candidate listings for the Little Klickitat River and Bloodgood Creek based on instream flow. The Little Klickitat River is listed twice for instream flow, at locations in T4N R15E section 28 (ID #6202) and near the river mouth at Wahkiacus (T4N R14E section 9; ID #6203). Bloodgood Creek is also listed based on instream flow (T4N R16E Section 17; ID #6200).

These three candidate listings are based on outdated information that in our opinion does not comply with Ecology's Policy WQP 1-11 requirements for age of data. In addition, a statement included in the Basis for the two Little Klickitat River listings appears to be erroneous. These are explained below, followed by our recommendation pertaining to these candidate listings.

Out-of-Date Data

Ecology Policy WQP 1-11 requires that the Water Quality Assessment be based on data collected in the 10 years preceding the beginning of the "call for data" period whenever possible. We understand that the "call for data" for the current Assessment ran through March 15, 2004. Therefore, data older than 1994 should be excluded from the 2002/2004 Assessment if possible. The Basis for these two candidate listings reference Ecology's 1990 Little Klickitat River Instream Flow Incremental Methodology (IFIM) study, which relied on data collected prior to 1990.

The age of the flow data is particularly relevant in this case since a significant increase in Little Klickitat River dry-season streamflow has been recently achieved by the City of Goldendale's transfer of its Bloodgood Spring 2 cfs water right to its Chlorination Station well located a few miles north of the river. Bloodgood Spring discharges directly to Bloodgood Creek, which is a tributary to the Little Klickitat River. This recent change therefore replaces a direct diversion of up to 2 cfs, which had generally been occurring during summer peak demand times, from the Little Klickitat River system. Consequently, current instream flows in the river are

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different than those cited in the 14-year-old IFIM study, which was based on data from when the City's Bloodgood Spring diversion was operating.

For the same reason, candidate listing #6200, Bloodgood Creek instream flow, is also based on outdated information that is no longer representative of current hydrologic conditions.

Erroneous or Unsubstantiated Information

Each of the two Little Klickitat River instream flow candidate listings contain the statement "Essentially all the water in the Little Klickitat River is diverted at the town of Goldendale." That statement is not accurate. The City of Goldendale diverts no surface water from the Little Klickitat River, and we are not aware of major diversions from the river within Goldendale or the immediately surrounding area. Ecology's gaging of the Little Klickitat River between June -and November 2000 documented continuous flow at stations upstream and downstream of Goldendale (Evans 2001).

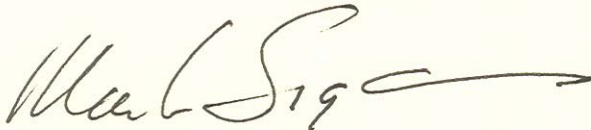
Conclusion and Recommendation

In summary, three of the 2002/2004 Water Quality Assessment candidate listings for instream flow (ID #6202 and #6203 for Little Klickitat River, and ID #6200 for Bloodgood Creek) are based on streamflow data greater than 10 years old and not representative of current hydrologic conditions. Given the recent water right change to increase river instream flows, it is our opinion that these old flow data are not sufficient for listing these waterbodies as having impaired instream flows in accordance with Ecology Policy WQP 1-11. Therefore, we recommend to Ecology that these listings be changed from Category 4c to Category 2, in accordance with provisions of Ecology Policy WQP 1-11.

In addition, the two Little Klickitat River instream flow candidate listings each contain an erroneous statement that all water from the Little Klickitat River is being diverted at Goldendale. We recommend to Ecology that this statement be deleted if it cannot be substantiated by information meeting data requirements of Ecology Policy WQP 1-11.

We appreciate the opportunity to submit these comments.

Sincerely,

A handwritten signature in dark ink, appearing to read "Mark Sigfrinius", followed by a long horizontal flourish.

Mark Sigfrinius,
Mayor